

UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF ILLINOIS

SAUNDRA POPEJOY)	
)	
Plaintiffs,)	
)	
v.)	No. 3:18-cv-83
)	
JACOB FIGGE and THE UNITED)	
STATES OF AMERICA,)	
)	
Defendant.)	

COMPLAINT

COUNT I

NOW COMES the Plaintiff, Sandra Popejoy, by her attorneys, the Womick Law Firm, Chtd., and for her Complaint against the Defendant, Jacob Figge, states as follows:

1. That the Plaintiff, Sandra Popejoy, is an individual who resides in Murphysboro, Jackson County, Illinois;
2. That at all times referred to herein the Plaintiff, Sandra Popejoy, was and is married to Jeremy Stone, her husband;
3. That on June 24, 2016, Jacob Figge was operating a US Government vehicle, registration number I484819, eastbound on Walnut Street at its intersection with 13th Street in Murphysboro, Jackson County, Illinois;
4. That as said time and date Sandra Popejoy was operating her vehicle southbound on North 13th Street at the intersection with Walnut Street in Murphysboro, Jackson County, Illinois;
5. That at said date and time, as Plaintiff approached and entered the intersection of

North 13th Street and Walnut Street the traffic control device facing her direction was illuminated green;

6. That the Plaintiff, proceeded to turn east onto Walnut Street, and was struck by a vehicle owned by the Defendant, The United States of America, and driven by the Defendant, Jacob Figge;

7. That at said time and place the Defendant, Jacob Figge, ran the red light, entered the intersection at a time when it was not safe to do so and at a time when the Plaintiff had already entered the intersection, and crashed into the Plaintiff causing her injuries of a personal and pecuniary nature;

8. That the Defendant, Jacob Figge, breached that duty and committed one or more of the following acts or omissions:

- a) Ran a red light at said intersection;
- b) Entered the intersection at a time when it was unsafe to do so.

9. That said acts or omissions caused the collision referred to and caused injuries to the Plaintiff of a personal and pecuniary nature.

WHEREFORE, the Plaintiff, Sandra Popejoy, prays for judgment against the Defendant, Jacob Figge, for an amount in excess of Seventy-Five Thousand Dollars (\$75,000.00).

COUNT II

NOW COMES the Plaintiff, Sandra Popejoy, by her attorneys, the WOMICK LAW FIRM, CHTD., and for her Complaint against the Defendant, The United States of America states as follows:

1. That the Plaintiff, Sandra Popejoy, is an individual who resides in Murphysboro, Jackson County, Illinois;

2. That at all times referred to herein the Plaintiff, Sandra Popejoy, was and is married to Jeremy Stone, her husband;

3. That on June 24, 2016, Jacob Figge was operating a US Government vehicle, registration number I484819, eastbound on Walnut Street at its intersection with 13th Street in Murphysboro, Jackson County, Illinois;

4. That as said time and date Sandra Popejoy was operating her vehicle southbound on North 13th Street at the intersection with Walnut Street in Murphysboro, Jackson County, Illinois;

5. That at said date and time, as Plaintiff approached and entered the intersection of North 13th Street and Walnut Street the traffic control device facing her direction was illuminated green;

6. That the Plaintiff, proceeded to turn east onto Walnut Street, and was struck by a vehicle owned by the Defendant, The United States of America, and driven by the Defendant, Jacob Figge;

7. That at said time and place the Defendant, Jacob Figge, ran the red light, entered the intersection at a time when it was not safe to do so and at a time when the Plaintiff had already entered the intersection, and crashed into the Plaintiff causing her injuries of a personal and pecuniary nature;

8. That the Defendant, Jacob Figge, breached that duty and committed one or more of the following acts or omissions:

- a) Ran a red light at said intersection;
- b) Entered the intersection at a time when it was unsafe to do so.

9. That said acts or omissions caused the collision referred to and caused injuries to the Plaintiff of a personal and pecuniary nature.

10. That at all times referred to herein, the Defendant, Jacob Figge, was an agent and employee of Defendant, The United States of America.

WHEREFORE, the Plaintiff, Sandra Popejoy, prays for judgment against the Defendant, Jacob Figge, for an amount in excess of Seventy-Five Thousand Dollars (\$75,000.00).

Respectfully submitted,

WOMICK LAW FIRM, CHTD.

/s/ JOHN WOMICK

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